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*Attorneys for Defendant Google LLC
(erroneously sued as Google Inc.)*

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA

REPUBLICAN NATIONAL COMMITTEE,

Plaintiff,

v.

GOOGLE INC.,

Defendant.

Case No. 2:22-cv-01904-DJC-JDP

**STIPULATION AND [PROPOSED]
ORDER FOR A CONTINUANCE OF
HEARING AS TO DEFENDANTS' [30]
MOTION TO DISMISS AND
PLAINTIFF'S [34] MOTION TO STRIKE**

Dept: Courtroom 10, 13th Floor

Judge: Hon. Daniel J. Calabretta

1 Plaintiff Republican National Committee (“Plaintiff”) and Defendant Google LLC
2 (“Defendant”; erroneously sued as “Google Inc.”) (collectively, the “Parties”), by and through
3 their undersigned counsel, hereby stipulate as follows:

4 1. WHEREAS, on June 6, 2023, the Court issued a Minute Order setting a Motion
5 Hearing as to Defendant’s [30] Motion to Dismiss and Plaintiff’s [34] Motion to Strike for
6 June 22, 2023 [44];

7 2. WHEREAS, on June 12, 2023, Plaintiff filed an *ex parte* application for a
8 continuance of the hearing as to Defendant’s [30] Motion to Dismiss and Plaintiff’s [34] Motion
9 to Strike [45] and amended *ex parte* application for a continuance of the hearing as to
10 Defendant’s [30] Motion to Dismiss and Plaintiff’s [34] Motion to Strike [46], requesting a
11 continuance of the hearing because Plaintiff’s lead counsel will be out of the country from
12 June 14 to June 22, 2023;

13 3. WHEREAS, on June 13, 2023, Defendant responded to the *ex parte* applications
14 that it does not oppose a reasonable continuance of the hearing to accommodate Plaintiff’s
15 counsel [47];

16 4. WHEREAS, there have been no prior extensions by the parties as to the hearing on
17 these motions;

18 5. WHEREAS, the Parties have worked with the Court to determine that July 13,
19 2023 is a mutually-agreeable date for the Parties and the Court; and

20 6. WHEREAS, Plaintiff withdraws its pending *ex parte* applications [45, 46];

21 THEREFORE, the Parties respectfully request that the Court vacate the June 22, 2023
22 hearing date, set Defendant’s [30] Motion to Dismiss and Plaintiff’s [34] Motion to Strike for an
23 in-person hearing on July 13, 2023 at 1:30 p.m. in Courtroom 10 before District Judge Daniel J.
24 Calabretta, and allot one hour for the hearing to ensure that all issues in both motions can be
25 adequately addressed to the Court’s satisfaction.

26 **IT IS SO STIPULATED.**

1
2 Dated: June 18, 2023

PERKINS COIE LLP

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5 By: /s/ Sunita Bali

Sunita Bali, Bar No. 274108

6 *Attorneys for Defendant Google LLC*
7 *(erroneously sued as Google Inc.)*

8 Dated: June 18, 2023

DHILLON LAW GROUP INC.

9
10 By: /s/ Michael A. Columbo

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ATTESTATION

Concurrence in the filing of this document has been obtained from the individual whose electronic signature is attributed above.

By: /s/ Sunita Bali

Sunita Bali, Bar No. 274108

Attorneys for Google LLC (erroneously sued
as Google Inc.)

[PROPOSED] ORDER

The Court, having reviewed the Stipulation for a Continuance of Hearing as to Defendant's [30] Motion to Dismiss and Plaintiff's [34] Motion to Strike, and good cause appearing, HEREBY ORDERS that the June 22, 2023 hearing date is vacated, Defendant's [30] Motion to Dismiss and Plaintiff's [34] Motion to Strike is set for an in-person hearing on July 13, 2023 at 1:30 p.m. in Courtroom 10 before District Judge Daniel J. Calabretta, and one hour is allotted for the hearing.

IT IS SO ORDERED.

Dated: June __, 2023

Hon. Daniel J. Calabretta
United States District Judge